

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE COMMONWEALTH OF PUERTO
RICO, *et al.*,

Debtors.*

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**MOTION IN COMPLIANCE WITH COURT ORDER AT DKT. NO. 19265 AND TO
FILE CERTIFIED TRANSLATIONS OF DOCUMENTS IN SUPPORT OF *CORRECTED*
JOINDER OF THE LAWFUL CONSTITUTIONAL DEBT COALITION TO THE
MEMORANDUM OF LAW OF THE OVERSIGHT BOARD IN SUPPORT OF ITS
*REQUEST FOR RULINGS REGARDING ACT 53-201 (DKT. NO. 19252)***

TO THE HONORABLE COURT:

COMES NOW the Lawful Constitutional Debt Coalition (the “LCDC”),¹ through the undersigned counsel, and very respectfully states and prays as follows:

* The Debtors in these Title III cases, along with each Debtor’s respective bankruptcy case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

¹ The members of the LCDC and their respective holdings are set forth in the *Thirteenth Supplemental Verified Statement of the Lawful Constitutional Debt Coalition Pursuant to Federal Rule of Bankruptcy Procedure 2019* (Dkt. No. 19128).

1. On November 16, 2021, LCDC filed its *Corrected Joinder of the Lawful Constitutional Debt Coalition to the Memorandum of Law of the Oversight Board in Support of its Request for Rulings Regarding Act 53-2021* (Dkt. No. 19252) (the “Joinder”).² The Joinder was accompanied by two exhibits in the Spanish Language.

2. The day before, the LCDC filed its *Motion to File Spanish Language Documents*, requesting a term to submit certified translations of the exhibits to the Joinder. Dkt. No. 19251.

3. By order (the “Order”) issued on November 16, 2021 (Dkt. No. 19265), this Honorable Court granted until November 23, 2021, at 12:00 p.m. AST, for the LCDC to submit the certified translations the exhibits.

4. The LCDC respectfully submits the certified translation of the exhibits to the Joinder.

WHEREFORE, the LCDC respectfully requests that this Honorable Court take notice of the above, deem the Order as complied with, and accept the attached certified translations of the exhibits to the Joinder.

² The filing of the Joinder was preceded by the filing of the *Joinder of the Lawful Constitutional Debt Coalition to the Memorandum of Law of the Oversight Board in Support of its Request for Rulings Regarding Act 53-2021* (Dkt. No. 19250) on November 15, 2021. However, the Joinder sought to replace that motion.

DATED: November 19, 2021

REICHARD & ESCALERA

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By :

/s/ Rafael Escalera

Rafael Escalera

USDC No. 122609

escalera@reichardescalera.com

/s/ Sylvia M. Arizmendi

Sylvia M. Arizmendi

USDC-PR 210714

arizmendis@reichardescalera.com

/s/ Carlos R. Rivera-Ortiz

Carlos R. Rivera-Ortiz

USDC-PR 303409

riverac@reichardescalera.com

255 Ponce de León Avenue

MCS Plaza, 10th Floor

San Juan, Puerto Rico 00917-1913

Susheel Kirpalani (*pro hac vice*)

susheelkirpalani@quinnemanuel.com

Daniel Salinas

USDC-PR 224006

danielsalinas@quinnemanuel.com

Eric Kay (*pro hac vice*)

erickay@quinnemanuel.com

Zachary Russell (*pro hac vice*)

zacharyrussell@quinnemanuel.com

51 Madison Avenue, 22nd Floor

New York, New York 10010-1603

Co-Counsel for the Lawful Constitutional Debt Coalition

CERTIFICATE OF SERVICE

I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel for the parties of record.

/s/ Carlos R. Rivera-Ortiz

USDC-PR 303409